

EXHIBIT U

Declaration of Peter C. Salerno
In Opposition to Plaintiffs' Motion to Compel
Against Yassin Abdullah Kadi

03 MDL 1570

January 2018

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn,

On behalf of the PECs, we write to respectfully request an extension of time to file any Motion to Compel against Yassin Kadi currently scheduled for October 13. Peter Salerno, counsel for Mr. Kadi, has consented to a request to make the new date to file said Motion, if necessary, to be **December 1, 2017**.

The reason for the request is due in large part to Mr. Kadi's voluminous production which was made on a rolling basis over the last two years that was recently completed, but containing thousands of pages, much of which is in Arabic. We have had several meet and confer exchanges and anticipate more to follow in November. We are also working on the opposition briefs regarding the Kingdom of Saudi Arabia's motion to dismiss which is due November 2.

On a personal note, I am scheduled to be in South America on an unrelated matter from October 2 through October 11. Although other members of the PEC have and will provide support on this issue, I have been the primary attorney discussing the Kadi production with Mr. Salerno.

The PEC does not object to Mr. Salerno's right to file a motion on behalf of his client, on or before the October 13 date the Court scheduled for motions addressing each party's discovery compliance. We further do not object if Mr. Kadi requests to defer his potential motion until the December 1 return date as well.

Accordingly, the PEC respectfully requests an extension of time to file any motion on the Kadi discovery compliance to now be filed by December 1, 2017.

We thank the Court for its consideration for this request.

Respectfully Submitted,

/s/ Andrew J. Maloney, III
ANDREW J. MALONEY, III
PLAINTIFFS' EXECUTIVE COMMITTEES

CC: PEC

Peter Salerno, Esq., Counsel for Kadi
Amy Rothstein, Esq., Counsel for Kadi